

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JENNIFER LEVINE,

PROPOSED DISCOVERY  
PLAN

Plaintiff,

CV 10-03135

-against-

JOHNSON & JOHNSON,

Defendant.

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Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, the parties propose the following discovery plan for the above referenced matter:

Initial Disclosures served: December 3, 2010

Date for service of initial document production demands and interrogatory requests with responses served within thirty (30) days: January 10, 2011

Deadline for motions to amend pleadings including joinder of additional parties: March 1, 2011

Depositions of fact witnesses: May 16, 2011

Factual discovery complete: June 3, 2011

Plaintiff's expert report exchanged: June 3, 2011

Defendant's expert report exchanged: July 5, 2011

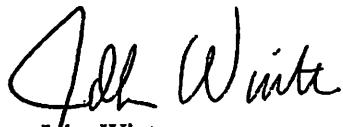
Expert discovery complete: August 8, 2011

Deadline for seeking approval to file any motion for summary judgment: September 1, 2011

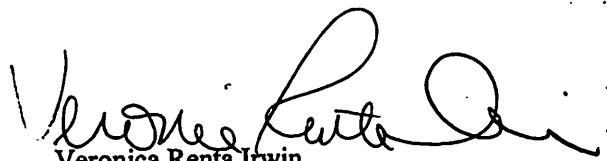
Date for submission of pre-trial order: November 1, 2011

Electronically stored information ("ESI") shall be produced on compact disc or in hard paper copy when specifically requested or referenced in a demand.

Dated: November 4, 2010



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